



May 23, 2018

Sent via email to chapman.apple@epa.gov

Apple Chapman  
Deputy Director, Air Enforcement Division  
Environmental Protection Agency  
1200 Pennsylvania Ave. NW  
Washington, D.C. 20004

Re: New Owner Clean Air Act Audit Program for Oil and Natural Gas Exploration and Production Facilities

Dear Ms. Chapman:

The Domestic Energy Producers Alliance (DEPA) appreciates EPA seeking comments on the draft template for the New Owner Clean Air Act Audit Program for Oil and Natural Gas Exploration and Production Facilities. DEPA requests a 60-day extension to the comment period, from June 4 until July 5.

DEPA is an alliance of producers, royalty owners, and oilfield service companies as well as state and national independent oil and gas associations representing the small business men and women of the energy industry, devoted to the survival of U.S. domestic crude oil and natural gas exploration and production. DEPA supports Executive Order 13783, which establishes a national policy to promote the clean and safe development of domestic energy resources while avoiding unnecessary regulatory burdens. We are concerned the template for the EPA's New Owner Clean Air Act Audit Program contradicts both the letter and spirit of Executive Order 13783 and could impose severe, unintended consequences and burdens on participants and non-participants.

Administrator Pruitt's "Back-to-Basics" agenda aims to refocus the agency on its core mission of protecting the environment through sensible regulations developed in cooperation with state, local and tribal partners. To fulfill increased transparency and collaboration by listening and working with impacted stakeholders, an additional 60 days would allow industry to fully evaluate the draft template and provide meaningful input.

We appreciate your consideration of our request for a 60-day extension from June 4 until July 5. If you have any questions, please contact Roger Kelley, Chairman of DEPA's Regulatory Committee at [roger.kelley@clr.com](mailto:roger.kelley@clr.com).

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Kelley", is written over a light blue rectangular background.

J. Roger Kelley  
Regulatory Chairman